

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

OPPENHEIMER & CO. INC.,

Plaintiff,

v.

STEVEN MITCHELL, DORI MITCHELL,
JEROME HOPPER, and LORI HOPPER,

Defendants.

Case No. 2:23-cv-00067-MJP

**STIPULATED MOTION REGARDING
BRIEFING SCHEDULE FOR MOTION
FOR PROTECTIVE ORDER AND
~~PROPOSED~~ ORDER**

Note for: April 20, 2023

Plaintiff Oppenheimer & Co. Inc. (“Oppenheimer”) and Defendants Steven Mitchell, Dori Mitchell, Jerome Hopper, and Lori Hopper (“Defendants”) (collectively, the “Parties”) hereby stipulate and agree as follows:

Whereas, in their Joint Status Report and Discovery Plan, the Parties set forth their disagreement on the appropriate scope of discovery in this action and indicated the anticipated need for the Court to resolve that dispute. Dkt. No. 51 at 2, 3;

Whereas, Defendants recently noticed subpoenas for depositions of third-party witnesses implicating the threshold question of the appropriate scope of discovery. *See* Dkt. Nos. 54 & 55;

Whereas, counsel for the Parties have conferred and agreed that it will be most efficient for the Court to issue an order concerning the scope of discovery prior to the taking of the noticed depositions;

Whereas, the Parties agree to address their dispute regarding the scope of discovery through the mechanism of Oppenheimer's moving for a protective order; and

Whereas, the Parties have agreed on a schedule for the briefing of that motion and also to reschedule the noticed depositions following the Court's adjudication of that motion, and further subject to the availability of the third-party deponents;

Therefore, the Parties stipulate and agree, and jointly move this Court, for an order establishing a briefing schedule and deadlines on the forthcoming motion for protective order as follows:

ACTION	DEADLINE
Oppenheimer's Motion for Protective Order	April 28, 2023
Defendants' Response	May 12, 2023
Oppenheimer's Reply	May 19, 2023
Noting Date (Without Oral Argument)	May 19, 2023

IT IS SO STIPULATED.

Dated: April 20, 2023.

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

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Counsel for Defendants

~~PROPOSED~~ ORDER

The Parties have stipulated to a briefing schedule for a forthcoming motion for protective order. Upon review of the record, IT IS SO ORDERED.

Dated this 20th day of April 2023.



Tana Lin
United States District Judge